

## **Exhibit 3**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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IN RE FTCA Flint Water Cases

Civil Action No.  
4:17-cv-11218  
(consolidated)  
Hon. Linda V. Parker

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The Video Recorded Remote Deposition of  
JULIE E. GOODMAN, Ph.D.  
Taken Via Golkow/Veritext Remote  
Commencing at 10:00 a.m.  
Wednesday, September 18, 2024  
Before Robin D. Gadwa, CSR 2607, RPR, FPR, FAPR  
  
Court reporter, attorneys & witness appearing remotely.

1 APPEARANCES:

2 MR. PATRICK HAINES

3 Napoli Shkolnik PLLC

4 360 Lexington Avenue, 11th Floor

5 New York, New York 10017

6 (212) 397-1000

7 planciotti@napolilaw.com

8 Appearing on behalf of the Plaintiffs.

9 MS. CARY S. MCGEHEE

10 Pitt McGehee Palmer & Rivers, PC

11 117 W. Fourth Street, Suite 200

12 Royal Oak, Michigan 48067

13 (248) 398-9800

14 cmcgehee@pittlawpc.com

15 Appearing on behalf of the Plaintiffs.

16 MS. DEBORAH LABELLE

17 Law Offices of Deborah A. Labelle

18 221 North Main Street, Suite 300

19 Ann Arbor, Michigan 48104

20 (734) 996-5620

21 deblabelle@aol.com

22 Appearing on behalf of the Plaintiffs.

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1 APPEARANCES CONTINUED:

2 MR. TIMOTHY B. WALTHALL

3 Trial Attorneys, Environmental Torts

4 U.S. Department of Justice

5 P.O. Box 340

6 Washington, D.C. 20044

7 (202) 616-4221

8 Appearing on behalf of the Defendants.

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10 VIDEOGRAPHER: PHILLIP TODD

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JULIE GOODMAN, PH.D.

having been first duly sworn, was examined and testified on her oath as follows:

DIRECT EXAMINATION

BY MR. HAINES:

Q Dr. Goodman, good morning. My name is Patrick Haines. I'm with the law firm of Napoli Shkolnik for the Plaintiffs. I'm going to ask you just a few questions here. I don't think this will go terribly long, but if you need to take a break at any point, just please let us know, we're here at your discretion so if you need to do anything or take a break or take a call, that's totally fine.

A Okay. Thank you.

Q Where are you located today?

A In Canton, Massachusetts.

Q My understanding is you have been retained to testify as an expert witness in this case. Is that your understanding as well?

A Yes.

Q Could you just as a general matter state what you understand the scope of your testimony to be in this case?

A My scope was to evaluate whether lead in water in Flint contributed to any, contributed to increased

1 blood lead levels and then adverse health effects  
2 generally in the Plaintiffs.

3 Q Okay. And you are a doctor, but not a medical doctor;  
4 correct?

5 A That is correct.

6 Q Nothing wrong with. A Ph.D. is pretty hard to get  
7 too. So I'm sure you worked hard to get it. But I  
8 just want to make clear. We understand. What was  
9 your Ph.D. in, Doctor?

10 A It was in environmental health sciences specializing  
11 in toxicology.

12 Q Okay. So you are a toxicologist; is that the best  
13 title that you feel?

14 A Well, I have expertise in both toxicology and  
15 epidemiology.

16 Q Okay.

17 A So. Yes.

18 Q Okay. My understanding is you work with a company  
19 called Gradient; is that correct?

20 A Yes.

21 Q Can you explain to me what Gradient is?

22 A Gradient is a health sciences and risk assessment  
23 consulting firm.

24 Q Okay. And the paperwork describes you as a principal  
25 at Gradient. Is there something -- what's the

CERTIFICATE OF NOTARY

STATE OF MICHIGAN )  
 ) SS  
COUNTY OF OAKLAND )

I, Robin D. Gadwa, Certified Shorthand  
Reporter, a Notary Public in and for the above county  
and state, do hereby certify that the above deposition  
was taken before me at the time and place hereinbefore  
set forth; that the witness was by me first duly sworn  
to testify to the truth, and nothing but the truth,  
that the foregoing questions asked and answers made by  
the witness were duly recorded by me stenographically  
and reduced to computer transcription; that this is a  
true, full and correct transcript of my stenographic  
notes so taken; and that I am not related to, nor of  
counsel to any of the parties, nor interested in the  
event of this cause.



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ROBIN D. GADWA, CSR-2607, RPR, FPR, FAPR  
Notary Public  
Oakland County, Michigan  
My commission expires: 12-08-2026